

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CR 18-2945 WJ

JANY LEVEILLE, et al.,

Defendants.

**UNOPPOSED MOTION TO EXTEND DEADLINES TO FILE RESPONSES AND  
REPLIES ON THE PARTIES DAUBERT MOTIONS**

Defendant Subhanah Wahhaj, by and through undersigned counsel Ryan J. Villa and Justine Fox-Young, on behalf of all Defendants, moves the Court to extend the deadline within which to file her Responses to the Government's Motions to Exclude Testimony [Docs. 759, 760, 761] to June 16, 2023; to extend the deadline to file Replies to the United States Responses [Docs. 764, 771] to June 16, 2023; and to extend the deadline to file a Response to the United States Motion to Exclude Defendant Leveille's expert, Dr. David Cook. *See* Doc. 763. As grounds tMs. Wahhaj states:

1. On May 1, 2023, Ms. Subhanah Wahhaj filed her Amended Notice of Expert Testimony. *See* Notice [Doc. 735].
2. On May 19, the Government filed its Motions to Exclude Ms. Wahhaj's experts Dr. Chitra Raghavan, Joost Janssen, and Dr. Shuki Cohen. *See* Motions [Doc. 759, 760, 761].
3. The deadline for Ms. Wahhaj's Responses to the Government's Motions is June 2, 2023.
4. On May 5, 2023, Mr. Siraj Wahhaj filed his Motion to Exclude or Limit Testimony of Government's Witness. *See* Motion [Doc. 742].

5. On May 19, 2023, the Government filed its Opposition to Mr. Wahhaj's Motion. *See* Response [Doc. 764].

6. The deadline to Reply is June 2, 2023.

7. On May 15, 2023, Defendants, by Defendant Hujrah Wahhaj, filed their Joint Motion to Exclude the United States' expert, Gloria Smirkle. *See* Doc. 754.

8. The United States filed its Response on May 26, 2023. *See* Doc. 771.

9. The deadline to Reply is June 9, 2023.

10. On May 19, 2023, the United States filed its Motion to Exclude Defendant Leveille's expert, Dr. David Cook. *See* Doc. 763.

11. The deadline to file the Response is June 2, 2023.

12. Counsel for Defendants need additional time to complete the Responses and Replies identified herein.

13. Accordingly, counsel requests the Court extend the deadlines for Responses and Replies to June 16, 2023.

14. The undersigned counsel has contacted counsel for the United States, AUSA Kimberly Brawley, regarding this Motion. Ms. Brawley has indicated that the United States does not oppose this Motion.

WHEREFORE, Counsel for Ms. Subhanah Wahhaj respectfully requests this Court enter an Order extending the time to file the responses and replies, as indicated above, to June 16, 2023.

Respectfully submitted,

/s/ Ryan J. Villa

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 1, 2023, I filed the foregoing electronically through the CM/ECF system, which caused counsel for the United States to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Ryan J. Villa  
RYAN J. VILLA